



T H E C I T Y O F N E W Y O R K

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January 13, 2022

BY ECF

Honorable Katharine H. Parker
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

APPLICATION GRANTED: The Initial Case Management Conference in this matter that is scheduled for Tuesday, February 8, 2022 at 10:30 a.m. in Courtroom 17D, 500 Pearl Street, New York, NY 10007 is hereby rescheduled to Wednesday, March 30, 2022 at 11:00 a.m.

APPLICATION GRANTED

Katharine H. Parker
Hon. Katharine H. Parker, U.S.M.J.

Re: Moore v. City of New York, et al. 21 Civ. 6600 (ALC) (KHP)

01/14/2022

Your Honor:

I am an Assistant Corporation Counsel in the Office of Georgia M. Pestana, Corporation Counsel of the City of New York, and the attorney for Defendants City of New York, Daniel Domarecki, Warren Savage, and Giselle Rodriguez in the above-referenced matter. The parties write jointly to request that the Court adjourn the initial pretrial conference, presently scheduled for February 8, 2022, until after the parties have fulfilled all requirements set forth by Local Civil Rule 83.10 (the “Plan.”)

By way of background, Plaintiff filed the Complaint on July 7, 2021 in the New York County Supreme Court, and this case was removed to the District Court for the Southern District of New York on August 4, 2021. ECF No. 1. On August 5, 2021, this case was designated for participation in the Plan. ECF Docket Entry dated August 5, 2021. By Order dated October 13, 2021, the Court directed the parties to file a joint status letter on or before November 15, 2021. ECF No. 5. In their November 15, 2021 status letter, the parties outlined the deadlines in this case as prescribed by the Plan. ECF No. 10. As set forth in the status letter, the parties were to complete the Plan-required initial mediation by March 21, 2022. See id. On January 3, 2022, the Court referred this case to Your Honor for general pretrial matters. ECF No. 12. Later that day, Your Honor scheduled an initial conference for February 8, 2022. ECF No. 13. In accordance with Your Honor’s individual rules, the parties must file a proposed case management plan at least one week before the initial case management conference.

The parties make the instant request so that they may proceed in accordance with the Plan. It would be duplicative to propose a discovery schedule at this time because the Plan already

prescribes an expedited discovery and mediation schedule. Additionally, the Plan is designed to promote early settlement and if the parties resolve this matter at or before the Plan-required mediation, a full discovery schedule will not be necessary at any point in this case. As such, it would be a more efficient use of the parties' and the Court's time to propose a discovery schedule and attend an initial pretrial conference after the parties have had an opportunity to complete the requirements set forth in the Plan.

Accordingly, for the reasons set forth above, the parties respectfully request that the Court adjourn the initial pretrial conference presently scheduled for February 8, 2022 until after March 21, 2022, when the parties have fulfilled all requirements forth by the Plan.

The parties thank the Court for its consideration herein.

Respectfully submitted,

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cc: **BY ECF**
All attorneys of record